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9 CITY OF RANCHO CORDOVA,

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11 AND DEREK HUTCHINS

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THOMAS WILLIAMS,

CARLOS WILLIAMS

22  
23 **UNITED STATES DISTRICT COURT**  
24  
25 **EASTERN DISTRICT OF CALIFORNIA**

26 THOMAS WILLIAMS,

Case No. 2:20-cv-00598-TLN-KJN

27 Plaintiff,  
Case No. 2:19-cv-02345-TLN-KJN

v.

28 **JOINT STIPULATION AND ORDER TO**  
**CONTINUE PRE-TRIAL DEADLINES**

1 COUNTY OF SACRAMENTO; CITY OF  
2 RANCHO CORDOVA; NATHAN  
3 DANIEL; JOSEPH ZALEC; DEREK  
HUTCHINS and DOES 1 through 50  
inclusive,

4 Defendants.

5 \_\_\_\_\_ /  
6 CARLOS WILLIAMS

7 Plaintiff

8 v.  
9

10 COUNTY OF SACRAMENTO;  
11 RANCHO CORDOVA POLICE DEPARTMENT;  
and DOES 1 through 50 inclusive,

12 Defendants.

13 \_\_\_\_\_ /  
14 Plaintiffs THOMAS WILLIAMS and CARLOS WILLIAMS (“Plaintiffs”) and Defendants  
15 COUNTY OF SACRAMENTO, CITY OF RANCHO CORDOVA, NATHAN DANIEL, JOSEPH  
16 ZALEC, AND DEREK HUTCHINS, (collectively “Defendants”), by and through their (“Parties”)  
17 counsel of record, hereby stipulate and request that the Court continue discovery and the pre-trial deadlines  
18 in this matter. Good cause exists for the requested continuance pursuant to Federal Rules of Civil  
19 Procedure Rule 16(d) based upon the following:

20 1. On July 15, 2021, this Court consolidated the above-referenced cases with respect to  
discovery only.

22 2. On October 5, 2021, in Case No. 2:20-cv-00598-TLN-KJN, this Court issued an Amended  
Pre-Trial Scheduling Order setting forth all pre-trial deadlines. The Court entered the same Order on  
24 October 26, 2021 in Case No. 2:19-cv-02345-TLN-KJN.

25 3. The Parties seek an extension of all pre-trial deadlines for the following reasons: (1) several  
discovery disputes have recently arisen which may require court intervention, one of which is now pending  
before the Court [ECF No. 26]; (2) Defendants have served subpoenas for medical records, some of which  
27 are still outstanding; (3) the Parties intend to conduct additional discovery and at least six (6) additional  
depositions in this case and need additional time for scheduling.

4. The Parties, through their respective undersigned counsel, agree and hereby do stipulate to respectfully request that the Court modify the scheduling order as follows:

| <b>Event</b>                           | <b>Schedule</b>                                      | <b>Proposed New Schedule</b> |
|--|--|------------------------------|
| Fact Discovery                         | May 12, 2022   | January 12, 2023             |
| Expert Witness Disclosure              | July 14, 2022  | March 14, 2023               |
| Supplemental Expert Witness Disclosure | Within 20 days after designation of expert witnesses | Remains unchanged            |
| Dispositive Motions                    | December 15, 2022                                    | August 15, 2023              |

Dated: April 6, 2022

BOHM LAW GROUP, INC.

By: /s/ Scott C. Zienty (auth. 3/31/22)  
Lawrence A. Bohm  
Scott C. Zienty  
Attorney for Plaintiffs

Dated: April 6, 2022

## LONGYEAR & LAVRA, LLP

By: /s/ Nicole M. Cahill (auth. 3/30/22)  
Van Longyear  
Nicole M. Cahill  
Attorney for Defendant  
COUNTY OF SACRAMENTO

Dated: April 6, 2022

PORTER SCOTT  
A PROFESSIONAL CORPORATION

By: /s/ John R. Whitefleet  
John R. Whitefleet  
Attorney for Defendants  
CITY OF RANCHO CORDOVA,  
NATHAN DANIEL, JOSEPH ZALEC,  
AND DEREK HUTCHINS

## ORDER

Good cause having been shown, based on the foregoing Stipulation by the Parties, the Court hereby ORDERS as follows:

1. The pre-trial deadlines in this case shall be amended as follows:

| <b>Event</b>                           | <b>Schedule</b>                                      | <b>Proposed New Schedule</b> |
|--|--|------------------------------|
| Fact Discovery                         | May 12, 2022   | January 12, 2023             |
| Expert Witness Disclosure              | July 14, 2022  | March 14, 2023               |
| Supplemental Expert Witness Disclosure | Within 20 days after designation of expert witnesses | Remains unchanged            |
| Dispositive Motions                    | December 15, 2022                                    | August 15, 2023              |

## **IT IS SO ORDERED.**

Dated: April 6, 2022

  
Troy L. Nunley  
United States District Judge